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VIA FEDERAL EXPRESS

Document Processing Center (Mail Code 7407M)
Room 6428
Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency, ICC Building
1201 Constitution Ave., NW
Washington, DC 20460

Dear 8(e) Coordinator:

8EHQ-1088-0759 Supplement

On October 5, 1988, DuPont submitted to the TSCA §8(e) office information concerning a groundwater monitoring program that had been conducted, pursuant to a Consent Order with the State of Virginia, at the DuPont Spruance facility in Richmond, Virginia. EPA responded to the submission in a letter dated October 28, 1988 and requested that EPA be apprised of any new health impact-related or exposure-related findings from the ongoing groundwater monitoring programs at/around the Spruance plant site.

On September 28, 1990, DuPont made a supplemental submission, under the above-identified 8EHQ number, notifying the TSCA §8(e) office that one of the monitored substances, hexamethylphosphoramide (HMPA), was detected in the James River and two other streams, in the Appomattox River at the intake of the Virginia American Water Company, and in water supplied to Hopewell Virginia by the water company (reported as Treated Municipal Supply and Treated Industrial Supply). The results reported for HMPA levels in Treated Municipal Supply were estimated, upon request of DuPont, as they were all below the practical quantitation limit (PQL) of 0.1 ppb attainable at that time.¹

DuPont has obtained additional monitoring results for intake (Appomattox River) and treated water samples of the Virginia American Water Company. The method detection limit (MDL) and the PQL for these samples are now lower than existed in 1990. Specifically, the MDL now ranges from 0.029-0.033 ug/L (ppb) and the PQL now ranges from 0.048-0.050 ug/L (ppb).

The maximum results from recent sampling of Virginia American Water Company treated water and Appomattox River intake were 0.058 ug/L (ppb) and 0.054 ug/L (ppb), respectively. Based on review of past available results, these results mark the first time that HMPA was detected by DuPont above (albeit barely above) the PQL [0.050 ug/L (ppb)] in Virginia American Water Company treated water. The recent sample results are as follows:



¹ For Treated Municipal Supply, the maximum reported estimated result was 0.07 JX (ppb). JX means the compound was detected and quantitated below the contract required quantitation limit.

| Sample Date | Virginia American Water Intake - Appomatox River (ug/L or ppb)* | Virginia American Water Treated Water (ug/L or ppb) |
|-------------------------------------|---|---|
| 10.25.07 | 0.051 | 0.051 |
| 10.25.07 (re-analysis) | 0.054 | 0.058 |
| 12.06.07 | 0.049 | 0.045J** |
| DuPont Community Exposure Guideline | 2.0 | 2.0 |

*PQL = 0.048-0.050 ug/L (ppb); MDL = 0.029-0.033 ug/L (ppb)

**J = concentration is estimated as a result of being above the MDL, but below the PQL

This information is being reported to the EPA TSCA §8(e) Office, regardless of the fact that the concentration levels are very low, in view of EPA's request that DuPont apprise EPA of any new exposure-related findings from the ongoing groundwater monitoring programs at/around the Spruance plant site. Because the treated water sample results are not estimates (as previously available and reported), the results might be considered by EPA to be new exposure-related information, even though the results are barely above the PQL and are less than the 2 ppb community exposure guideline discussed below.

DuPont has developed a 2 ppb community exposure guideline for HMPA in drinking water. EPA Region III has indicated that, considering the lack of EPA-derived toxicity criteria, the DuPont 2 ppb community exposure guideline for HMPA may be used to screen analytical data for potential non-carcinogenic human health effects in potentially potable water at the Spruance site.² EPA Region III also stated that the community exposure guideline may be appropriate for risk-based decision making, if no other contaminants with similar toxicologic endpoints are present in the medium of concern.³ The concentration of HMPA detected at the Virginia American Water Company plant is well below the 2 ppb community exposure guideline.

The information provided in this letter has also been, or will be, reported to the Virginia American Water Company, the Virginia Department of Environmental Quality (DEQ), VDEQ Piedmont Regional Office, and EPA Region III (Corrective Action Office).

Please contact me directly if you wish to discuss further.

Very truly yours,



Andrea V. Malinowski

² EPA Region III (E. Quinn) memo to DuPont (M. Jacobi), dated August 27, 2007

³ EPA Region III (E. Quinn) memo to DuPont (M. Jacobi), dated August 27, 2007